

From: [Robinson, Seika](#)
To: jimesensei@yahoo.com
Bcc: [Pohle, David](#); [Finocchiaro, Marco](#); [Guerrero, Carmen](#); [Font, Jose](#); [Rivera, Jose](#); [Rodriguez, Nancy](#); [Feinmark, Phyllis](#); [Font, Jose](#); [Sutter-Montalvo, Lisa](#); [Velez, Hector](#); [Melendez-Colon, Suzette](#)
Subject: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Monday, September 14, 2020 2:44:00 PM
Attachments: [Rincon Hotel - Exhibit No. 1.pdf](#)
[308 letter Rincon Hotel - Rincon Blue Water, LLC \(Sept 11 2020\).pdf](#)

Please see the attached “Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)” Letter.

Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Robinson, Seika](#)
To: ["jimesensei@yahoo.com"](mailto:jimesensei@yahoo.com)
Subject: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Monday, November 23, 2020 9:59:00 AM
Attachments: [Rincon Hotel - Exhibit No. 1.pdf](#)
[308 letter Rincon Hotel - Rincon Blue Water, LLC \(Sept 11 2020\).pdf](#)

Jesus M. Jimenez,

I am still awaiting your response to the attached letters.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika

Sent: Monday, September 14, 2020 2:45 PM

To: jimesensei@yahoo.com

Subject: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Please see the attached "Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)" Letter.

Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Robinson, Seika](#)
To: ["lonnie fuller"](#)
Subject: FW: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Thursday, December 10, 2020 8:55:00 AM
Attachments: [2020 September 11 - Rincon Hotel 308 Letter Exhibit No. 1.pdf](#)
[2020 September 11 - Rincon Hotel 308 Letter for Rincon Blue Water, LLC.pdf](#)

From: Robinson, Seika

Sent: Wednesday, December 9, 2020 1:11 PM

To: 'jimesensei@yahoo.com' <jimesensei@yahoo.com>; 'miguel sarriera@yahoo.com' <miguelsarriera@yahoo.com>

Cc: Finocchiario, Marco <Finocchiario.Marco@epa.gov>

Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Good Afternoon,

I received your voicemail about the technical errors happening between our emails. I have attached the documents and cc'd my supervisors email address so your response can be sent to both of us in case emails can't reach me again.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika

Sent: Thursday, December 3, 2020 1:48 PM

To: jimesensei@yahoo.com

Cc: [miguel sarriera@yahoo.com](mailto:miguelsarriera@yahoo.com)

Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Jesus M. Jimenez,

I am still awaiting your response to the attached letters.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika

Sent: Monday, September 14, 2020 2:45 PM

To: jimesensei@yahoo.com

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Please see the attached "Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)" Letter.

Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [lonnie fuller](#)
To: [Robinson, Seika](#)
Subject: Fw: purchase deed
Date: Thursday, January 28, 2021 2:41:27 PM
Attachments: [ESCRITURA#45-MELVIN E. RODRIGUEZ TORRES-03122019151918 .pdf](#)

Good day Ms. Robinson

Happy New Year to you as well!!

As per your request, attached is the purchase deed on the Rincon property.

Best regards
Lonnie Fuller

----- Forwarded Message -----

From: Jesus M. Jimenez <jimesensei@yahoo.com>
To: Lonnie Fuller <lonniejf@yahoo.com>
Sent: Thursday, January 28, 2021, 11:47:41 AM MST
Subject: purchase deed

Lonnie:

This is the purchase deed. I have problems downloading the mortgage deed.

LCDO. JESÚS M. JIMÉNEZ

(Esta tramitación vía e-mail se ha enviado para el uso exclusivo del individuo o entidad a quien va dirigido y puede contener información privilegiada, confidencial y exenta de ser revelada bajo el derecho vigente. Si la persona que lee esta transmisión no es su destinatario o un empleado o agente autorizado de éste, por la presente se le notifica que cualquier distribución, disseminación, reproducción o publicación de ésta comunicación está estrictamente prohibida. Si usted ha recibido esta comunicación por error, por favor notifiquenos de inmediato a través de nuestro número telefónico (787) 866-1114 y devuelva el original de la transmisión a vuelta de correo, Gracias)

From: [Lennie Fuller](#)
To: [Seika Robinson](#)
Subject: Fed. Response
Date: Wednesday, December 20, 2023 4:20:38 PM

Sent from my iPhone

Begin forwarded message:

From: Lennie Fuller <lenmie2@yahoo.com>
Date: December 20, 2023 at 12:07:00 PM MST
To: robinson.seika@epa.gov, Seika Robinson <robinson.seika@epa.gov>
Cc: Justin Ramirez <jramirez@yahoo.com>
Subject: Response

Good day Ms. Robinson

Attached you will find the response as per your request.

Best regards
Lennie Fuller

P. S. Happy New Year!!

RINCON BLUE WATER LLC

COND. OCEAN VIEW
5575 AVE. ISLA VERDE APT. 702
CAROLINA, PUERTO RICO 00979-5643

December 28, 2020

Seika E. Robinson
Watershed Management Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 24 floor
New York, NY 10007

Email: robinson.seika@epa.gov

Dear Mrs. Robinson:

We acknowledge receipt of the letter sent to Rincon Blue Water LLC (from now on RBW) in relation to the property located in the Encedada neighborhood of the Municipality of Rincon. RBW acquired said property in March 2019 from its previous owner Calrincón Corp.

In or around October 2018, RBW became aware that third parties had deposited landfill on the property and immediately requested that it should be removed. Calrincón Corp., never informed RBW that there was a case or complaint with EPA about the landfill.

There is currently a foreclosure case filed by Calrincón Corp., and in which RBW is requesting that the contract of sale must be rescinded because Calrincón Corp., failed to report such an important fact. If RBW had become aware of the existence of the case before EPA, the deeds of sale and mortgage would not have been signed.

RBW became aware of the existence of the case before EPA in August 2019 and in that same month learned that Karimar Construction inc., was the one who deposited the landfill. Karimar Construction Inc., on 2018 deposited the landfill with the authorization of Calrincón Corp.

Having explained what has happened, we will answer your questions.

1. A description of current ownership of the Site, specifically ownership information for each of the two parcels where filling activity has occurred, and recent (past five years) ownership history.

- ***RBW reply:*** RBW became the owner of the property on March 12, 2019. Attach you will find the Deeds. *RBW emphatically contends that it has not conducted any landfill*

deposit activity on the property that is the subject of this investigation. The landfill was deposited by Karimar Construction Inc., and Calrincon Corp.

2. A description and any documentation of site leasing to you.

- **RBW reply:** There was no lease

3. A description of the nature and the purpose of the Work at the Site.

- **RBW reply:** RBW has not done any work on that property.

4. A list of the dates on which the Work was performed.

- **RBW reply:** RBW has not done any work on that property.

5. A list of the names and titles of persons who conducted and/or gave orders for, or had oversight over the Work, and describe each person's role in the Work, including the names of contractors and/or construction companies who conducted and/or gave orders for, or had oversight over, the Work.

- **RBW reply:** RBW has not done any work on that property.

6. Copies of any survey, construction, or engineering plans for the Work or for portions thereof.

- **RBW reply:** RBW has not done any work on that property.
The landfill was deposited by Karimar Construction Inc., and Calrincon Corp.

7. A copy of any construction/engineering plans submitted to the Municipality of Rincon, Puerto Rico Department of Natural and Environmental Resources, Puerto Rico Land Authority, and any other local or commonwealth agencies, for permits or other authorizations for the Work.

- **RBW reply:** RBW has not submitted anything to the Municipality of Rincon.

8. A copy of any documents related to approvals or requests for work.

- **RBW reply:** There are no permits and no authorization issued by the corresponding agencies.

9. A description of the type, volume, and source of any fill material used in the Work.

- ***RBW reply:*** RBW has no knowledge of the type, volume, or origin of the landfill that was deposited on the property. This is known by Karimar Construction Inc., and Calrincon Corp.

10. A description of the locations and depths of fill at the Site.

- ***RBW reply:*** RBW has no knowledge of the location and depth of the deposited fill. This is known by Karimar Construction Inc., and Calrincon Corp.

11. A description of the manner in which the Work was conducted, including the type of equipment used in conducting the Work.

- ***RBW reply:*** RBW has no knowledge of the way the work was conducted. RBW also have no knowledge of what equipment was used. This is known by Karimar Construction Inc., and Calrincon Corp.

12. Copies of any correspondence or information which you have with or from any Federal, Commonwealth, local, or other agencies relating to the status of portions of the Site as wetlands, streams, or as areas of environmental or ecological significance.

- ***RBW reply:*** To our best knowledge RBW did not received, nor has received correspondence or information from any state and/ or federal agency indicating that in that sector are portions of the Site as wetlands, streams, or areas of environmental or ecological significance.

13. Copies of any aerial photographs, surveys, reports, maps or plans depicting the preexisting vs. current conditions, topography, soils, and hydrology at the Site which you may have, beyond that which is generally, publicly available.

- ***RBW reply:*** To the best of our knowledge RBW does not have any copies of aerial photographs, surveys, reports, maps, or plans depicting the pre-existing vs. current conditions, topography, soil's, and hydrology at the site which may have, beyond that which is generally publicly available.

14. If the Work is related to farming, ranching, silviculture, or any other activities, please describe to the best of your knowledge the nature and locations of on-going agricultural activities prior to commencement of the Work, and during the prior twenty years.

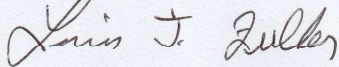
- **RBW reply:** RBW has not done any work on that property. The information requested is known to Karimar Construction Inc., and Calrincón Corp.

15. Please inform us whether or not the Work has included any modifications to the depths and/or widths of any ditches on the Site, and if yes, please provide descriptions of the locations and the modifications.

- **RBW reply:** RBW has not done any work on that property. The information requested is known to Karimar Construction Inc., and Calrincón Corp.

Sincerely;

S/ Lonnie J. Fuller

A handwritten signature in cursive script, appearing to read "Lonnie J. Fuller".

From: [lonnie fuller](#)
To: [Robinson, Seika](#)
Cc: [Jesus Jiménez](#); [Jesus Jiménez](#)
Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Monday, June 7, 2021 10:12:09 AM
Attachments: [2020 September 11 - Rincon Hotel 308 Letter Exhibit No. 1.pdf](#)
[2020 September 11 - Rincon Hotel 308 Letter for Rincon Blue Water, LLC.pdf](#)

Good day Mrs. Robinson

I hope this note finds you well.

I was hoping you could up-date me as to the status of our case on the Rincon property?

Thanking you in advance.

Best regards

Lonnie Fuller

Managing partner

Rincon Blue Water

On Wednesday, April 14, 2021, 02:02:32 PM MST, lonnie fuller <lonniejf@yahoo.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: "Robinson, Seika" <Robinson.Seika@epa.gov>
Date: December 10, 2020 at 6:55:48 AM MST
To: lonnie fuller <lonniejf@yahoo.com>
Subject: FW: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

From: Robinson, Seika
Sent: Wednesday, December 9, 2020 1:11 PM
To: 'jimesensei@yahoo.com' <jimesensei@yahoo.com>; 'miguel sarriera@yahoo.com' <miguelsarriera@yahoo.com>
Cc: Finocchiaro, Marco <Finocchiaro.Marco@epa.gov>
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Good Afternoon,

I received your voicemail about the technical errors happening between our emails. I have attached the documents and cc'd my supervisors email address so your response can be sent to both of us in case emails can't reach me again.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika
Sent: Thursday, December 3, 2020 1:48 PM
To: jimesensei@yahoo.com
Cc: miguelsarriera@yahoo.com
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Jesus M. Jimenez,

I am still awaiting your response to the attached letters.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika
Sent: Monday, September 14, 2020 2:45 PM
To: jimesensei@yahoo.com
Subject: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

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Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Robinson, Seika](#)
To: jimesensei@yahoo.com; miguelsarriera@yahoo.com
Cc: [Finocchiaro, Marco](#)
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Wednesday, December 9, 2020 1:10:00 PM
Attachments: [2020 September 11 - Rincon Hotel 308 Letter Exhibit No. 1.pdf](#)
[2020 September 11 - Rincon Hotel 308 Letter for Rincon Blue Water, LLC.pdf](#)

Good Afternoon,

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Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika
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To: jimesensei@yahoo.com
Cc: miguelsarriera@yahoo.com
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Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Robinson, Seika](#)
To: ["jimesensei@yahoo.com"](mailto:jimesensei@yahoo.com)
Cc: ["miguelsarriera@yahoo.com"](mailto:miguelsarriera@yahoo.com)
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Thursday, December 3, 2020 1:48:00 PM

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Ms. Seika E. Robinson
Life Scientist, Wetlands Protection Section
U.S. Environmental Protection Agency, Region 2
290 Broadway, 24th Floor
New York, NY 10007
(212) 637-3822

From: [Robinson, Seika](#)
To: [Reinaldo Franqui](#)
Cc: [Finocchiaro, Marco](#); [Karimar Construction, Inc.](#); santos.giancarlo@gmail.com
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Friday, November 20, 2020 10:48:00 AM

Please send all future correspondence through email and not through regular mail. The office is closed due to COVID-19 and my team and I have been working in our own individual homes.

Seika Robinson

USEPA, Wetlands Protection Section

From: Reinaldo Franqui <rfranqui@gmail.com>

Sent: Friday, November 20, 2020 10:35 AM

To: Robinson, Seika <Robinson.Seika@epa.gov>

Cc: Finocchiaro, Marco <Finocchiaro.Marco@epa.gov>; Karimar Construction, Inc. <karimarinc@yahoo.com>; santos.giancarlo@gmail.com

Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Good morning, today I'm not in the office. But the response letter was sent thru mail with certified delivery. On Monday, I will email a copy of the email and the corresponding evidence.

Lcdo. Reinaldo José Franqui Escandón

Attorney at Law

84-2 Calle Progreso

Aguadilla, P.R. 00603

Tel./Fax (787) 819-0001

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indeed the case and disclaim any responsibility attributable thereto.

On Nov 20, 2020, at 11:28 AM, Robinson, Seika <Robinson.Seika@epa.gov> wrote:

Lcdo. Reinaldo José Franqui Escandón,

Good morning. The 30-day time extension to respond to our letter has expired and I have yet to receive a response. Can I please get an update as to the progress of your response letter?

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika

Sent: Tuesday, October 13, 2020 4:36 PM

To: Reinaldo Franqui <rfranqui@gmail.com>; Finocchiaro, Marco
<Finocchiaro.Marco@epa.gov>

Cc: Karimar Construction, Inc. <karimarinc@yahoo.com>; santos.giancarlo@gmail.com

Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Lcdo. Reinaldo José Franqui Escandón,

A 30-day extension to answer the requested information has been granted.

Seika Robinson

USEPA, Wetlands Protection Section

From: Reinaldo Franqui <rfranqui@gmail.com>

Sent: Tuesday, October 13, 2020 3:30 PM

To: Robinson, Seika <Robinson.Seika@epa.gov>

Cc: Karimar Construction, Inc. <karimarinc@yahoo.com>; santos.giancarlo@gmail.com

Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Good afternoon, I inform you that Karimar Construction Inc. has retained our legal counsel for the referred matter. Hereby advance a copy of the letter sent today, in which we ask for an extension of the term given to answer and provide additional information as requested the past September 14, 2020.

If you have any questions please do not hesitate to call or email me.

Lcdo. Reinaldo José Franqui Escandón

Attorney at Law

84-2 Calle Progreso

Aguadilla, P.R. 00603

Tel./Fax (787) 819-0001

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para asegurar que los datos que aquí se incluyen están libre de virus u otro contenido malintencionado, no podemos asegurar que así sea y, por lo tanto, no nos hacemos responsables de cualquier daño atribuible al caso.

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From: [lonnie fuller](#)
To: [Robinson, Seika](#)
Cc: [Jesus Jiménez](#); [Jesus Jiménez](#)
Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
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Thanking you in advance.

Best regards

Lonnie Fuller

Managing partner

Rincon Blue Water

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Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Lorrie Fuller](#)
To: [Selma Robinson](#)
Subject: RE: Response
Date: Tuesday, January 28, 2020 11:58:00 AM

Happy New Year,
I just got back to viewing the submitted documents and I don't see an attached deed like the letter mentions. Can you send me that document when you get the chance?
Selma Robinson
LESPA, Wetlands & Protection Section

From: Lorrie Fuller <lorrie.f@epa.gov>
Sent: Wednesday, December 30, 2019 4:20 PM
To: Robinson, Selma <srobinso@epa.gov>
Subject: Fwd: Response

Sent from my iPhone

Begin forwarded message:

From: Lorrie Fuller <lorrie.f@epa.gov>
Date: December 30, 2019 at 12:57:00 PM MST
To: srobinso@epa.gov; Selma Robinson <srobinso@epa.gov>
Cc: lorrie.f@epa.gov
Subject: Response

Good day Ms. Robinson
Attached you will find the response as per your request.
Best regards,
Lorrie Fuller
P. S. Happy New Year!!

RINCON BLUE WATER LLC

COND. OCEAN VIEW
5575 AVE. ISLA VERDE APT. 702
CAROLINA, PUERTO RICO 00979-5643

December 28, 2020

Seika E. Robinson
Watershed Management Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 24 floor
New York, NY 10007

Email: robinson.seika@epa.gov

Dear Mrs. Robinson:

We acknowledge receipt of the letter sent to Rincon Blue Water LLC (from now on RBW) in relation to the property located in the Encedada neighborhood of the Municipality of Rincon. RBW acquired said property in March 2019 from its previous owner Calrincón Corp.

In or around October 2018, RBW became aware that third parties had deposited landfill on the property and immediately requested that it should be removed. Calrincón Corp., never informed RBW that there was a case or complaint with EPA about the landfill.

There is currently a foreclosure case filed by Calrincón Corp., and in which RBW is requesting that the contract of sale must be rescinded because Calrincón Corp., failed to report such an important fact. If RBW had become aware of the existence of the case before EPA, the deeds of sale and mortgage would not have been signed.

RBW became aware of the existence of the case before EPA in August 2019 and in that same month learned that Karimar Construction inc., was the one who deposited the landfill. Karimar Construction Inc., on 2018 deposited the landfill with the authorization of Calrincón Corp.

Having explained what has happened, we will answer your questions.

1. A description of current ownership of the Site, specifically ownership information for each of the two parcels where filling activity has occurred, and recent (past five years) ownership history.
 - ***RBW reply:*** RBW became the owner of the property on March 12, 2019. Attach you will find the Deeds. *RBW emphatically contends that it has not conducted any landfill*

deposit activity on the property that is the subject of this investigation. The landfill was deposited by Karimar Construction Inc., and Calrincon Corp.

2. A description and any documentation of site leasing to you.

- **RBW reply:** There was no lease

3. A description of the nature and the purpose of the Work at the Site.

- **RBW reply:** RBW has not done any work on that property.

4. A list of the dates on which the Work was performed.

- **RBW reply:** RBW has not done any work on that property.

5. A list of the names and titles of persons who conducted and/or gave orders for, or had oversight over the Work, and describe each person's role in the Work, including the names of contractors and/or construction companies who conducted and/or gave orders for, or had oversight over, the Work.

- **RBW reply:** RBW has not done any work on that property.

6. Copies of any survey, construction, or engineering plans for the Work or for portions thereof.

- **RBW reply:** RBW has not done any work on that property.
The landfill was deposited by Karimar Construction Inc., and Calrincon Corp.

7. A copy of any construction/engineering plans submitted to the Municipality of Rincon, Puerto Rico Department of Natural and Environmental Resources, Puerto Rico Land Authority, and any other local or commonwealth agencies, for permits or other authorizations for the Work.

- **RBW reply:** RBW has not submitted anything to the Municipality of Rincon.

8. A copy of any documents related to approvals or requests for work.

- **RBW reply:** There are no permits and no authorization issued by the corresponding agencies.

9. A description of the type, volume, and source of any fill material used in the Work.

- ***RBW reply:*** RBW has no knowledge of the type, volume, or origin of the landfill that was deposited on the property. This is known by Karimar Construction Inc., and Calrincon Corp.

10. A description of the locations and depths of fill at the Site.

- ***RBW reply:*** RBW has no knowledge of the location and depth of the deposited fill. This is known by Karimar Construction Inc., and Calrincon Corp.

11. A description of the manner in which the Work was conducted, including the type of equipment used in conducting the Work.

- ***RBW reply:*** RBW has no knowledge of the way the work was conducted. RBW also have no knowledge of what equipment was used. This is known by Karimar Construction Inc., and Calrincon Corp.

12. Copies of any correspondence or information which you have with or from any Federal, Commonwealth, local, or other agencies relating to the status of portions of the Site as wetlands, streams, or as areas of environmental or ecological significance.

- ***RBW reply:*** To our best knowledge RBW did not received, nor has received correspondence or information from any state and/ or federal agency indicating that in that sector are portions of the Site as wetlands, streams, or areas of environmental or ecological significance.

13. Copies of any aerial photographs, surveys, reports, maps or plans depicting the preexisting vs. current conditions, topography, soils, and hydrology at the Site which you may have, beyond that which is generally, publicly available.

- ***RBW reply:*** To the best of our knowledge RBW does not have any copies of aerial photographs, surveys, reports, maps, or plans depicting the pre-existing vs. current conditions, topography, soil's, and hydrology at the site which may have, beyond that which is generally publicly available.

14. If the Work is related to farming, ranching, silviculture, or any other activities, please describe to the best of your knowledge the nature and locations of on-going agricultural activities prior to commencement of the Work, and during the prior twenty years.

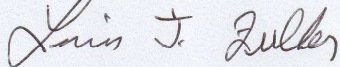
- ***RBW reply:*** RBW has not done any work on that property. The information requested is known to Karimar Construction Inc., and Calrincón Corp.

15. Please inform us whether or not the Work has included any modifications to the depths and/or widths of any ditches on the Site, and if yes, please provide descriptions of the locations and the modifications.

- ***RBW reply:*** RBW has not done any work on that property. The information requested is known to Karimar Construction Inc., and Calrincón Corp.

Sincerely;

S/ Lonnie J. Fuller

A handwritten signature in cursive script, appearing to read "Lonnie J. Fuller".

From: [Robinson, Seika](#)
To: [Rivera, Jose](#); [Pohle, David](#)
Cc: [Finocchiario, Marco](#); [Melendez-Colon, Suzette](#)
Subject: RE: Rincon Bluewater email
Date: Monday, September 14, 2020 2:45:00 PM

Thank you!

Seika Robinson

USEPA, Wetlands Protection Section

From: Rivera, Jose <Rivera.Jose@epa.gov>
Sent: Monday, September 14, 2020 2:16 PM
To: Pohle, David <Pohle.David@epa.gov>
Cc: Robinson, Seika <Robinson.Seika@epa.gov>; Finocchiario, Marco <Finocchiario.Marco@epa.gov>; Melendez-Colon, Suzette <melendez-colon.suzette@epa.gov>
Subject: RE: Rincon Bluewater email
Attorney for Blue Water. Suzette and I met with him a while ago.
Jesus M. Jimenez <jimesensei@yahoo.com>

From: Pohle, David <Pohle.David@epa.gov>
Sent: Monday, September 14, 2020 11:45 AM
To: Robinson, Seika <Robinson.Seika@epa.gov>; Finocchiario, Marco <Finocchiario.Marco@epa.gov>; Rivera, Jose <Rivera.Jose@epa.gov>
Subject: RE: Rincon Bluewater email
Hello Jose,
Do you have an email address for this? Earlier today Seika sent the 308 letters to Karimar and Calrincon via email, but she lacks an email address for Blue Water.
Thanks,
Dave

From: Robinson, Seika <Robinson.Seika@epa.gov>
Sent: Monday, September 14, 2020 11:14 AM
To: Pohle, David <Pohle.David@epa.gov>; Finocchiario, Marco <Finocchiario.Marco@epa.gov>
Subject: Rincon Bluewater email
Do you guys have the email address for:
Rincon Blue Water, LLC
Attn: Lonnie J. Fuller
Ms. Seika E. Robinson
Life Scientist, Wetlands Protection Section
U.S. Environmental Protection Agency, Region 2
290 Broadway, 24th Floor
New York, NY 10007
(212) 637-3822

From: [lonnie fuller](#)
To: [Robinson, Seika](#)
Cc: [Jesus Jiménez](#); [Jesus Jiménez](#)
Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Monday, June 7, 2021 10:12:09 AM
Attachments: [2020 September 11 - Rincon Hotel 308 Letter Exhibit No. 1.pdf](#)
[2020 September 11 - Rincon Hotel 308 Letter for Rincon Blue Water, LLC.pdf](#)

Good day Mrs. Robinson

I hope this note finds you well.

I was hoping you could up-date me as to the status of our case on the Rincon property?

Thanking you in advance.

Best regards

Lonnie Fuller

Managing partner

Rincon Blue Water

On Wednesday, April 14, 2021, 02:02:32 PM MST, lonnie fuller <lonniejf@yahoo.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: "Robinson, Seika" <Robinson.Seika@epa.gov>
Date: December 10, 2020 at 6:55:48 AM MST
To: lonnie fuller <lonniejf@yahoo.com>
Subject: FW: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

From: Robinson, Seika
Sent: Wednesday, December 9, 2020 1:11 PM
To: 'jimesensei@yahoo.com' <jimesensei@yahoo.com>; 'miguel sarriera@yahoo.com' <miguelsarriera@yahoo.com>
Cc: Finocchiario, Marco <Finocchiario.Marco@epa.gov>
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Good Afternoon,

I received your voicemail about the technical errors happening between our emails. I have attached the documents and cc'd my supervisors email address so your response can be sent to both of us in case emails can't reach me again.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika
Sent: Thursday, December 3, 2020 1:48 PM
To: jimesensei@yahoo.com
Cc: miguelsarriera@yahoo.com
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Jesus M. Jimenez,

I am still awaiting your response to the attached letters.

Seika Robinson

USEPA, Wetlands Protection Section

From: Robinson, Seika
Sent: Monday, September 14, 2020 2:45 PM
To: jimesensei@yahoo.com
Subject: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)

Please see the attached "Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)" Letter.

Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [Robinson, Seika](#)
To: jimesensei@yahoo.com; miguelsarriera@yahoo.com
Cc: [Finocchiaro, Marco](#)
Subject: RE: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
Date: Wednesday, December 9, 2020 1:10:00 PM
Attachments: [2020 September 11 - Rincon Hotel 308 Letter Exhibit No. 1.pdf](#)
[2020 September 11 - Rincon Hotel 308 Letter for Rincon Blue Water, LLC.pdf](#)

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USEPA, Wetlands Protection Section

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Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [lonnie fuller](#)
To: [Robinson, Seika](#)
Cc: [Jesus Jiménez](#); [Jesus Jiménez](#)
Subject: Re: Clearing and filling for commercial building work, Municipality of Rincon, Puerto Rico, Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. Section 1318(a)
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Thanking you in advance.

Best regards

Lonnie Fuller

Managing partner

Rincon Blue Water

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To: 'jimesensei@yahoo.com' <jimesensei@yahoo.com>; 'miguel sarriera@yahoo.com' <miguelsarriera@yahoo.com>
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Ms. Seika E. Robinson

Life Scientist, Wetlands Protection Section

U.S. Environmental Protection Agency, Region 2

290 Broadway, 24th Floor

New York, NY 10007

(212) 637-3822

From: [lonnie fuller](#)
To: robison.seika@epa.gov; [Robinson, Seika](#)
Cc: [Jesus Jiménez](#)
Subject: Response
Date: Wednesday, December 30, 2020 2:07:26 PM

Good day Ms. Robinson

Attached you will find the response as per your request.

Best regards
Lonnie Fuller

P. S. Happy New Year!!